

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Michael Solarek
Debtor

CHAPTER 13

Carrington Mortgage Services, LLC,
Movant,

BANKRUPTCY CASE NUMBER
20-12541/PMM

v.

Michael Solarek,
Respondent/Debtor,
and
Scott Waterman, Trustee,
Additional Respondent.

**OBJECTION OF CARRINGTON MORTGAGE SERVICES, LLC TO CONFIRMATION
OF DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

Carrington Mortgage Services, LLC, by and through its counsel, LOGS Legal Group LLP, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about June 5, 2020, Debtor filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by Debtor's principal residence located at 41 West 2nd Street, Alburtis, PA 18011.
3. On or about August 4, 2020, Movant filed a Proof of Claim citing total debt claim in the amount of \$42,221.34.
4. Debtor's proposed plan calls for the desire to enter into a loan modification agreement; however if Debtor's does not receive a loan modification the proposed Plan will not be feasible.
5. Debtor's is not guaranteed to be approved for a loan modification and Debtor's plan does not call a contingency paragraph should Debtor's be denied for a loan modification.
6. The Plan is insufficiently funded to pay Movant its proposed arrearage claim or proposed total debt claim in full.
7. The Plan fails to comply with 11 U.S.C. § 1322.
8. The Plan fails to comply with 11 U.S.C. § 1325.

9. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, Carrington Mortgage Services, LLC respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

/s/ Kristen D. Little

Dated: June 29, 2021

BY: _____
Kristen D. Little, Esquire
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LLG File #:20-065417

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CERTIFICATE OF SERVICE

I, Kristen D. Little, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of Carrington Mortgage Services, LLC's Objection to the Confirmation of Debtor's Chapter 13 Plan by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on June 28, 2021:

Michael Solarek
239 East Elm Street
Allentown, PA 18109

Marc Kranson, Esquire
523 Walnut Street
Allentown, PA 18101- Sent via electronic notification mgwbankruptcy@yahoo.com

Scott Waterman, Trustee
Chapter 13 Trustee
2901 St. Lawrence Avenue, Suite 100
Reading, PA 19606- Sent via electronic notification ecfmail@fredreigle13.com

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
TRUE AND CORRECT.

/s/ Kristen D. Little

Kristen D. Little
LOGS Legal Group LLP
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(610) 278-6800

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